

BLACKCLIFFS MOBILE HOME PARK (PWS 6030003) SOURCE WATER ASSESSMENT FINAL REPORT

November 1, 2000



State of Idaho Department of Environmental Quality

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Executive Summary

Under the Safe Drinking Water Act Amendments of 1996, all states are required by the U.S. Environmental Protection Agency to assess every source of public drinking water for its relative sensitivity to contaminants regulated by the act. This assessment is based on a land use inventory of the designated assessment area and sensitivity factors associated with the wells and aquifer characteristics.

This report, *Source Water Assessment for the Blackcliffs Mobile Home Park* describes the public drinking water system, the boundaries of the zones of water contribution, and the associated potential contaminant sources located within these boundaries. This assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this source. **The results should not be used as an absolute measure of risk and they should not be used to undermine public confidence in the water system.**

The Blackcliffs Mobile Home Park consists of one well located in the courtyard. The date of construction for the well is unknown. Total coliform bacteria exceeded the Maximum Contaminate Level in the water sampling efforts of November 1992, July 1994 and August 1998. The presence of total coliform bacteria has been detected in the distribution system and well source water samples. Also, Nitrate levels exceeded the Maximum Contaminant Level (10 mg/L) in the water sampling efforts of March 1989 (14.47 mg/L), August 1991, December 1999 (10.7 mg/L), and May 2000 (13.2 mg/L). The potential contaminant sources within the delineation capture zones include one welding shop. The final well ranking was high for microbial and inorganic contaminants, and moderate for volatile organic and synthetic organic contaminants.

For the Blackcliffs Mobile Home Park, source water protection activities should focus on implementation of practices aimed at keeping the distribution system free of microbial contaminants and nitrates. Disinfection should be considered if microbial problems arise and/or persist. The water system should also focus on improving the wellhead protection strategy. A 2000 Sanitary Survey disapproved the well because of no well vent. Fixing this problem will improve the system construction score and lower the potential for contamination. Furthermore, the water system should also be aware of potential risks due to inorganic contaminants (nitrates). The sanitary survey also recommended that due to the high nitrate levels in the drinking water, Blackcliff Mobile Home Park should consider connecting to the City of Pocatello's water system. Land uses within most of the source water assessment area are beyond the control of the water system. Therefore, partnerships with state and local agencies should be established to ensure future land uses are protective of ground water quality. Due to the time involved with the movement of ground water, source water protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term.

This assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what ranking a source receives, protection is always important. Whether the source is currently located in a "pristine" area or an area with numerous industrial and/or agricultural land uses that require education and surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

A community with a fully developed source water protection program will incorporate many strategies. For assistance in developing protection strategies please contact Pocatello Regional Office of the Idaho Department of Environmental Quality or the Idaho Rural Water Association.

SOURCE WATER ASSESSMENT FOR BLACKCLIFFS MOBILE HOME PARK, IDAHO

Section 1. Introduction - Basis for Assessment

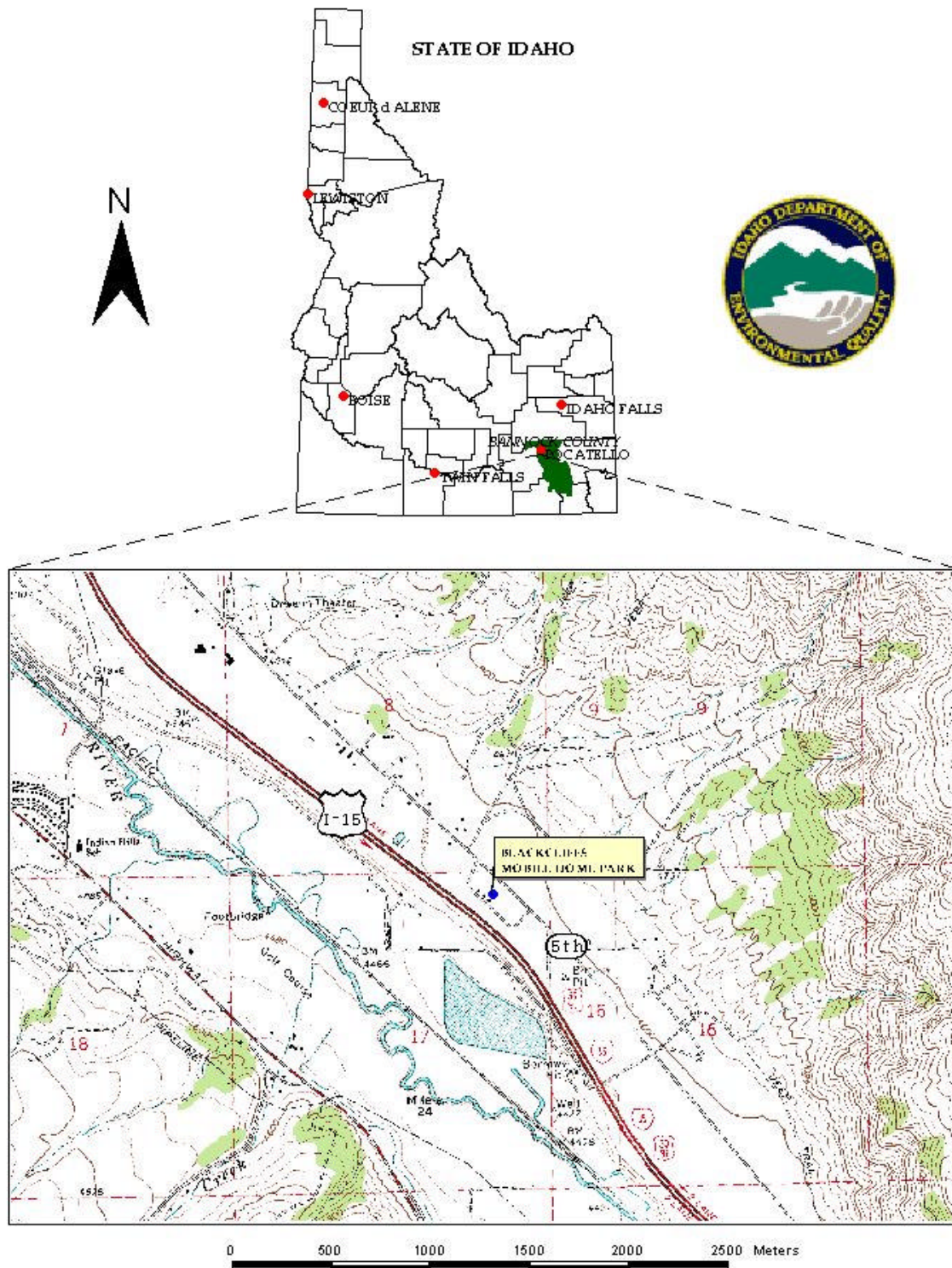
The following sections contain information necessary to understand how and why this assessment was conducted. **It is important to review this information to understand what the ranking of this source means.** A map showing the delineated source water assessment area and the inventory of significant potential sources of contamination identified within that area are contained in this report. The list of significant potential contaminant source categories and their rankings used to develop this assessment is also attached.

Level of Accuracy and Purpose of the Assessment

The Idaho Department of Environmental Quality (DEQ) is required by the U.S. Environmental Protection Agency (EPA) to assess the over 2,900 public drinking water sources in Idaho for their relative susceptibility to contaminants regulated by the Safe Drinking Water Act. This assessment is based on a land use inventory of the delineated assessment area, sensitivity factors associated with the wells, and aquifer characteristics. All assessments must be completed by May of 2003. The resources and time available to accomplish assessments are limited. Therefore, an in-depth, site-specific investigation to identify each significant potential source of contamination for every public water system is not possible. **This assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this source. The results should not be used as an absolute measure of risk and they should not be used to undermine public confidence in the water system.**

The ultimate goal of the assessment is to provide data to local communities to develop a protection strategy for their drinking water supply system. DEQ recognizes that pollution prevention activities generally require less time and money to implement than treatment of a public water supply system once it has been contaminated. DEQ encourages communities to balance resource protection with economic growth and development. The decision as to the amount and types of information necessary to develop a source water protection program should be determined by the local community based on its own needs and limitations. Wellhead or source water protection is one facet of a comprehensive growth plan, and it can complement ongoing local planning efforts.

Figure 1 - GEOGRAPHIC LOCATION OF BLACKCLIFFS MOBILE HOME PARK



Section 2. Conducting the Assessment

General Description of the Source Water Quality

Blackcliffs Mobile Home Park (MHP) is a community public drinking water system serving approximately 200 persons. The water system is bordered by Interstate I-15 to the southwest and South 5th Street to the northeast in Bannock County (Figure 1). Residents receive their water from one well source located in the courtyard.

Total coliform bacteria exceeded the Maximum Contaminate Level (MCL) in the water sampling efforts of November 1992, July 1994 and August 1998. The presence of total coliform bacteria has been detected in the distribution system and well source water samples. Nitrate levels exceeded the MCL (10 mg/L) in the water sampling efforts of March 1989 (14.47 mg/L), December 1999 (10.7 mg/L), and May 2000 (13.2 mg/L). The primary water quality issue currently facing the water system is total coliform bacteria, nitrates, and the problems associated with managing this contamination.

Defining the Zones of Contribution--Delineation

The delineation process establishes the physical area around a well that will become the focal point of the assessment. The process includes mapping the boundaries of the zone of contribution into time of travel zones (zones indicating the number of years necessary for a particle of water to reach a pumping well) for water in the aquifer. Dr. John Welhan of the Idaho Geological Survey used analytical models approved by the EPA to determine the 3-year (Zone 1B), 6-year (Zone 2), and 10-year (Zone 3) time of travel zone for the well.

Two different transmissivities (from two nearby wells) were used for the Blackcliffs MHP well because of limited knowledge concerning well design. The cigar-shaped capture zones are for a high transmissivity value (computed with the analytical model) and the round shape capture zones are for a low transmissivity value (for a modified calculated fixed radius method). Well-specific information was derived from a variety of sources including sanitary surveys, local well logs, and operator records. The actual data used by Dr. Welhan in determining the zone of contribution are available upon request.

For the Blackcliffs MHP ground water originates from the low-permeability colluvial (rocks and/or soils accumulated at the foot of a slope) and bedrock aquifers which are adjacent, and tributary, to the Bonneville gravels. Ground water flow direction is thought to be primarily from tributary valley underflow from the southeast

Identifying Potential Sources of Contamination

A potential source of contamination is defined as any facility or activity that stores, uses, or produces, as a product or by-product, the contaminants regulated under the Safe Drinking Water Act and has a sufficient likelihood of releasing such contaminants at levels that could pose a concern relative to drinking water sources. The goal of the inventory process is to locate and describe those facilities, land uses, and environmental conditions that are potential sources of ground water contamination. The locations of potential sources of contamination within the delineation areas were obtained by field surveys conducted by DEQ and from available databases.

It is important to understand that a release may never occur from a potential source of contamination

provided best management practices are used at the facility. Many potential sources of contamination are regulated at the federal level, state level, or both to reduce the risk of release. Therefore, when a business, facility, or property is identified as a potential contaminant source, this should not be interpreted to mean that this business, facility, or property is in violation of any local, state, or federal environmental law or regulation. What it does mean is that the potential for contamination exists due to the nature of the business, industry, or operation. There are a number of methods that water systems can use to work cooperatively with potential sources of contamination, such as educational visits and inspections of stored materials. Many owners of such facilities may not even be aware that they are located near a public water supply well.

Contaminant Source Inventory Process

A two-phased contaminant inventory of the study area was conducted during August 2000. The first phase involved identifying and documenting potential contaminant sources within the Blackcliffs MHP Source Water Assessment Area through the use of computer databases and Geographic Information System maps developed by DEQ. The second, or enhanced, phase of the contaminant inventory involved contacting the operator to validate the sources identified in phase one and to add any additional potential sources in the area. This task was undertaken with the assistance of Mr. Doug Patterson, owner of the mobile home park.

There is a total of one potential contaminant source located in the delineated capture zones (Figure 2). Contaminants of concern are primarily business chemicals such as petroleum products, solvents, and degreasers. Table 1 lists the potential contaminants of concern, time of travel zones, and information source. The topographical map shows a borrow pit located within the 10-year time of travel zone. On August 29, 2000 DEQ contacted Bill Aller, Bannock County, who informed DEQ that the gravel pit was formerly owned by a private paving company. That company sold the gravel pit to a private individual whom, in November 1999, reclaimed the pit. The dominant land use outside the Blackcliffs MHP is urban development.

FIGURE 2 - BLACKCLIFFS MOBILE HOME PARK: Delineation Map and Potential Contaminant Source Locations

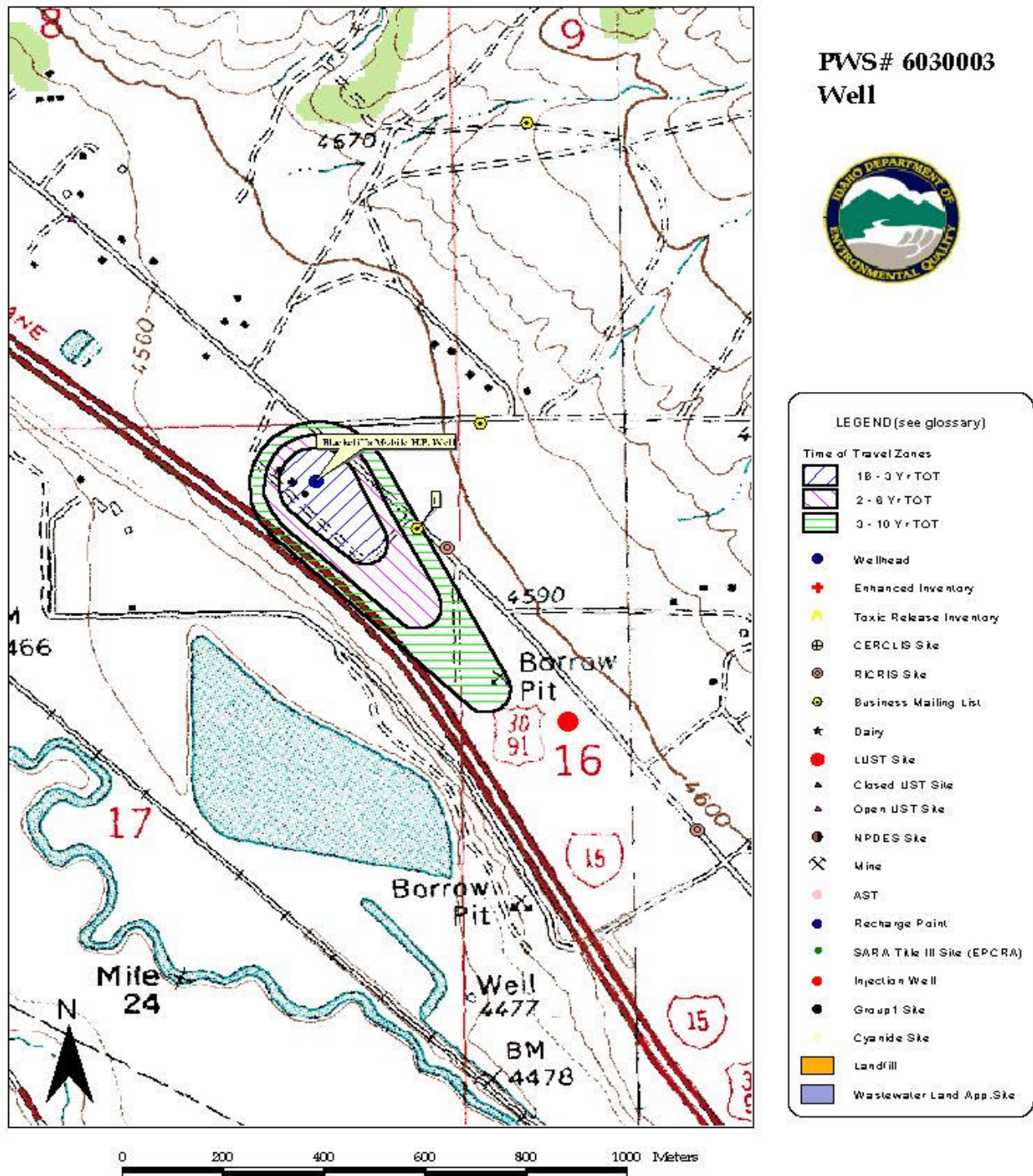


Table 1. Blackcliffs Mobile Home Park, Potential Contaminant Inventory

SITE #	Source Description	TOT Zone (years)	Source of Information	Potential Contaminants
1	Welding Business	10	Database Inventory	VOC

TOT = time of travel (in years) for a potential contaminant to reach the wellhead

VOC = volatile organic chemical,

Section 3. Susceptibility Analyses

The susceptibility of the well to contamination was ranked as high, moderate, or low risk according to the following considerations: hydrologic characteristics, physical integrity of the well, land use characteristics, and potentially significant contaminant sources. The susceptibility rankings are specific to a particular potential contaminant or category of contaminants. Therefore, a high susceptibility rating relative to one potential contaminant does not mean that the water system is at the same risk for all other potential contaminants. The relative ranking that is derived for the well is a qualitative, screening-level step that, in many cases, uses generalized assumptions and best professional judgement. The following summaries describe the rationale for the susceptibility ranking.

Hydrologic Sensitivity

Hydrologic sensitivity was rated high for the well source (see Table 2). The soils in the delineation area are considered to be in the moderate to well drainage class. No well log data was available to determine the make up of the vadose zone (zone from land surface to the water table). Furthermore, there is no information as to whether the well has 50 feet of low permeability units which would reduce the downward flow of contaminants.

Well Construction

Well construction directly affects the ability of the well to protect the aquifer from contaminants. Lower scores imply a system that can better protect the water. The Blackcliffs MHP drinking water system consists of one well that extracts ground water for domestic use. The well system construction rating is moderate for the well source (Table 2). Though no well log is available, the sanitary survey report indicates that the total depth of the well is 275 feet below ground surface (bgs) and has a 14-inch diameter casing. Two pumps are located inside the well casing. One pump is estimated at 225 feet bgs (in operation) and the second is estimated at 215 feet bgs (backup). The static water level is estimated at 160 feet bgs. The sanitary survey also shows that the well casing height is substandard and there is not an approved casing vent on the well. There was a lack of information concerning gravel packing and surface sealing, two important aspects of proper well construction.

The well was given an additional point (no well log available) because it could not be determined if it meets current well construction standards. The Idaho Department of Water Resources (IDWR) *Well Construction Standards Rules (1993)* require all public water systems (PWSs) to follow DEQ standards. IDAPA 58.01.08.550 requires that PWSs follow the *Recommended Standards for Water Works (1997)* during construction. Various aspects of the standards can be assessed from well logs. Table 1 of the *Recommended Standards for Water Works (1997)* states that 14-inch steel casing

requires a thickness of 0.375 inches instead of the presumed 0.250-inch thickness of the well. The standards state that screen will be installed and have openings based on sieve analysis of the formation. Standard 3.2.4.1 requires all PWSs to have yield and drawdown tests that last “24 hours or until stabilized drawdown has continued for six hours at 1.5 times the design pumping rate” (Recommended Standards for Water Works, 1997).

Potential Contaminant Source and Land Use

The well rated low for inorganic chemicals (IOCs) (i.e. nitrate, lead, copper), synthetic organic chemicals (SOCs) (i.e. pesticides), volatile organic chemicals (VOCs) (i.e. petroleum products) and microbial contaminants. Total coliform bacteria exceeded the Maximum Contaminate Level (MCL) in the water sampling efforts of November 1992, July 1994 and August 1998. After a positive water sample test for the bacteria, the operator usually doses the system with liquid chlorine in an effort to control the bacteria problems. DEQ records indicate that total coliform bacteria have been detected in both the distribution system and well source water samples. Nitrate levels exceeded the MCL (10 mg/L) in the water sampling efforts of March 1989 (14.47 mg/L), August 1991, December 1999 (10.7 mg/L), and May 2000 (13.2 mg/L). The dominant land use in the delineated source water area is urban development.

Final Susceptibility Rating

A detection above a drinking water standard Maximum Contaminant Level (MCL), any detection of a VOC or SOC, or a detection of total coliform or fecal coliform will automatically give a high susceptibility rating to the final well ranking despite the land use of the area because a pathway for contamination already exists. In this case, the final well ranking was high for microbial contaminants and IOCs (nitrate). Final scores rated moderate for VOC contaminants and SOC contaminants.

Table 2. Summary of Blackcliffs Mobile Home Park Susceptibility Evaluation

Well	Susceptibility Scores									
	Hydrologic Sensitivity	Contaminant Inventory				System Construction	Final Susceptibility Ranking			
		IOC	VOC	SOC	Microbials		IOC	VOC	SOC	Microbials
1	H	L	L	L	L	M	H*	M	M	H*

H = High Susceptibility, M = Moderate Susceptibility, L = Low Susceptibility

IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical

H* = Indicates source automatically scored as high susceptibility due to presence of microbial contaminant above the maximum contaminant level in the tested well water.

Susceptibility Summary

Levels of nitrate contamination that approach or exceed the drinking water MCL for nitrate (10 mg/L) currently threaten the Blackcliffs MHP. A DEQ ground water study (1994) concludes that septic systems were likely the source of the nitrates. The report also stated that soils data obtained from the

bottom of the abandoned sewage lagoon indicated that the lagoon is not the source of the nitrogen that is impacting the ground water system. On September 1, 2000 Mr. Doug Patterson (current owner of Blackcliffs MHP) stated that the mobile home park connected to the City of Pocatello sewer system in 1977.

The February 2000 sanitary survey reported the water system might be required to install treatment, such as a reverse osmosis system, if nitrate levels remain above the MCL. Another option would be to connect to the City of Pocatello's water system.

Section 4. Options for Source Water Protection

The susceptibility assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what the susceptibility ranking a source receives, protection is always important. Whether the source is currently located in a "pristine" area or an area with numerous industrial and/or agricultural land uses that require education and surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

An effective source water protection program is tailored to the particular local source water protection area. A community with a fully developed source water protection program will incorporate many strategies. For the Blackcliffs MHP, source water protection activities should focus on implementation of practices aimed at keeping the distribution system free of microbial contaminants and nitrates. Disinfection should be considered if microbial problems arise and/or persist. The water system should also focus on improving the wellhead protection strategy. Furthermore, the water system should also be aware of potential risks due to nitrates. The water system should consider connecting to the City of Pocatello's water system or installing a treatment system for the elevated nitrate levels. Land uses within most of the source water assessment area are beyond the control of the water system, therefore, partnerships with state and local agencies should be established to ensure future land uses are protective of ground water quality. Any new businesses that employ potentially harmful chemicals should be monitored as well. Due to the time involved with the movement of ground water, wellhead protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term.

Assistance

Public water supplies and others may call the following DEQ offices with questions about this assessment and to request assistance with developing and implementing a local protection plan. In addition, draft protection plans may be submitted to the DEQ office for preliminary review and comments.

Pocatello Regional DEQ Office (208) 236-6160

State DEQ Office (208) 373-0502

Website: <http://www2.state.id.us/deq>

Water suppliers serving fewer than 10,000 persons may contact John Bokor, Idaho Rural Water Association, at 1-800-962-3257 for assistance with wellhead protection strategies.

POTENTIAL CONTAMINANT INVENTORY LIST OF ACRONYMS AND DEFINITIONS

AST (Aboveground Storage Tanks) – Sites with aboveground storage tanks.

Business Mailing List – This list contains potential contaminant sites identified through a yellow pages database search of standard industry codes (SIC).

CERCLIS – This includes sites considered for listing under the **Comprehensive Environmental Response Compensation and Liability Act (CERCLA)**. CERCLA, more commonly known as “Superfund” is designed to clean up hazardous waste sites that are on the national priority list (NPL).

Cyanide Site – DEQ permitted and known historical sites/facilities using cyanide.

Dairy – Sites included in the primary contaminant source inventory represent those facilities regulated by Idaho State Department of Agriculture (ISDA) and may range from a few head to several thousand head of milking cows.

Deep Injection Well – Injection wells regulated under the Idaho Department of Water Resources generally for the disposal of stormwater runoff or agricultural field drainage.

Enhanced Inventory – Enhanced inventory locations are potential contaminant source sites added by the water system. These can include new sites not captured during the primary contaminant inventory, or corrected locations for sites not properly located during the primary contaminant inventory. Enhanced inventory sites can also include miscellaneous sites added by the Idaho Department of Environmental Quality (IDEQ) during the primary contaminant inventory.

Floodplain – This is a coverage of the 100-year floodplains.

Group 1 Sites – These are sites that show elevated levels of contaminants and are not within the priority one areas.

Inorganic Priority Area – Priority one areas where greater than 25% of the wells/springs show constituents higher than primary standards or other health standards.

Landfill – Areas of open and closed municipal and non-municipal landfills.

LUST (Leaking Underground Storage Tank) – Potential contaminant source sites associated with leaking underground storage tanks as regulated under RCRA.

Mines and Quarries – Mines and quarries permitted through the Idaho Department of Lands.)

Nitrate Priority Area – Area where greater than 25% of wells/springs show nitrate values above 5mg/l.

NPDES (National Pollutant Discharge Elimination System) – Sites with NPDES permits. The Clean Water Act requires that any discharge of a pollutant to waters of the United States from a point source must be authorized by an NPDES permit.

Organic Priority Areas – These are any areas where greater than 25 % of wells/springs show levels greater than 1% of the primary standard or other health standards.

Recharge Point – This includes active, proposed, and possible recharge sites on the Snake River Plain.

RICRIS – Site regulated under **Resource Conservation Recovery Act (RCRA)**. RCRA is commonly associated with the cradle to grave management approach for generation, storage, and disposal of hazardous wastes.

SARA Tier II (Superfund Amendments and Reauthorization Act Tier II Facilities) – These sites store certain types and amounts of hazardous materials and must be identified under the Community Right to Know Act.

Toxic Release Inventory (TRI) – The toxic release inventory list was developed as part of the Emergency Planning and Community Right to Know (Community Right to Know) Act passed in 1986. The Community Right to Know Act requires the reporting of any release of a chemical found on the TRI list.

UST (Underground Storage Tank) – Potential contaminant source sites associated with underground storage tanks regulated as regulated under RCRA.

Wastewater Land Applications Sites – These are areas where the land application of municipal or industrial wastewater is permitted by DEQ.

Wellheads – These are drinking water well locations regulated under the Safe Drinking Water Act. They are not treated as potential contaminant sources.

NOTE: Many of the potential contaminant sources were located using a geocoding program where mailing addresses are used to locate a facility. Field verification of potential contaminant sources is an important element of an enhanced inventory.

References Cited

Aller, Bill. 2000. Personal communication.

Great Lakes-Upper Mississippi River Board of State and Provincial Public Health and Environment Managers, 1997. "Recommended Standards for Water Works."

Idaho Department of Environmental Quality. 1997. Design Standards for Public Drinking Water Systems. IDAPA 58.01.08.550.01.

Idaho Department of Environmental Quality. 1994. *Blackcliffs Ground water Quality Study: Nitrate Impacts*

Idaho Department of Environmental Quality. 2000. *Blackcliffs Mobile Home Park Sanitary Survey Report*

Idaho Department of Water Resources, 1993. Administrative Rules of the Idaho Water Resource Board: Well Construction Standards Rules. IDAPA 37.03.09.

Patterson, Doug. 2000. Personal communication

Welhan, J. 2000. Idaho Geologic Survey. *SWA Capture Zone Delineations, Lower Portneuf and Marsh Valleys*

Attachment A

Blackcliffs Mobile Home Park Susceptibility Analysis Worksheet

The final scores for the susceptibility analysis were determined using the following formulas:

- 1) VOC/SOC/IOC Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.2)
- 2) 2) Microbial Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.35)

Final Susceptibility Scoring:

0 - 5 Low Susceptibility

6 - 12 Moderate Susceptibility

≥ 13 High Susceptibility

Ground Water Susceptibility Report

Public Water System Name :

Public Water System Number 6030003

BLACKCLIFFS MOBILE HOME PARK

Well#1 :

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1. System Construction		SCORE			
Drill Date	1/1/1000				
Driller Log Available	NO				
Sanitary Survey (if yes, indicate date of last survey)	YES	2000			
Well meets IDWR construction standards	NO	1			
Wellhead and surface seal maintained	NO	1			
Casing and annular seal extend to low permeability unit	NO	2			
Highest production 100 feet below static water level	YES	0			
Well located outside the 100 year flood plain	YES	0			
Total System Construction Score		4			
2. Hydrologic Sensitivity					
Soils are poorly to moderately drained	NO	2			
Vadose zone composed of gravel, fractured rock or unknown	YES	1			
Depth to first water > 300 feet	NO	1			
Aquitard present with > 50 feet cumulative thickness	NO	2			
Total Hydrologic Score		6			
3. Potential Contaminant / Land Use - ZONE 1A		IOC Score	VOC Score	SOC Score	Microbial Score
Land Use Zone 1A	URBAN/COMMERCIAL	2	2	2	2
Farm chemical use high	NO	0	0	0	
IOC, VOC, SOC, or Microbial sources in Zone 1A	YES	YES	NO	NO	YES
Total Potential Contaminant Source/Land Use Score - Zone 1A		2	2	2	2
Potential Contaminant / Land Use - ZONE 1B					
Contaminant sources present (Number of Sources)	NO	0	0	0	0
(Score = # Sources X 2) 8 Points Maximum		0	0	0	0
Sources of Class II or III leacheable contaminants or	NO	0	0	0	
4 Points Maximum		0	0	0	
Zone 1B contains or intercepts a Group 1 Area	NO	0	0	0	0
Land use Zone 1B	Less Than 25% Agricultural Land	0	0	0	0
Total Potential Contaminant Source / Land Use Score - Zone 1B		0	0	0	0
Potential Contaminant / Land Use - ZONE II					
Contaminant Sources Present	NO	0	0	0	
Sources of Class II or III leacheable contaminants or	NO	0	0	0	
Land Use Zone II	Less than 25% Agricultural Land	0	0	0	
Potential Contaminant Source / Land Use Score - Zone II		0	0	0	0
Potential Contaminant / Land Use - ZONE III					
Contaminant Source Present	YES	0	1	0	
Sources of Class II or III leacheable contaminants or	YES	0	1	0	
Is there irrigated agricultural lands that occupy > 50% of	NO	0	0	0	
Total Potential Contaminant Source / Land Use Score - Zone III		0	2	0	0
Cumulative Potential Contaminant / Land Use Score		2	4	2	2
4. Final Susceptibility Source Score		10	11	10	11

5. Final Well Ranking	High	Moderate	Moderate	High

